

March 18, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*
(ET Docket No. 13-49) – NOTICE OF ORAL EX PARTE
PRESENTATION

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(2) of the Commission's Rules to notify the Commission that earlier today, Mary L. Brown, Director, Government Affairs of Cisco Systems, Inc. ("Cisco") and the undersigned met with David Goldman, Senior Legal Advisor to Commissioner Jessica Rosenworcel, to discuss the above-referenced proceeding.

Cisco presented the findings of its February 2014 Visual Networking Index mobile data forecast relating to the exploding demand for Wi-Fi and thus the need for the Commission to improve Wi-Fi access to the 5 GHz band. Most importantly, we noted that by 2018, it is expected that almost two-thirds of all mobile data traffic will be offloaded to Wi-Fi and that by 2017 almost one-half of all local access IP traffic will be over Wi-Fi. The attached materials were provided to Mr. Goldman at the meeting.

Cisco also noted that, if the Commission believes it is necessary to adopt special rules to govern outdoor use of the U-NII-1 band to protect the underutilized feeder uplink spectrum licensed to Globalstar, Inc. ("Globalstar"), Cisco supports the March 4, 2014 proposal by the National Cable & Telecommunications Association ("NCTA"). Under that proposal, use of the U-NII-1 band would be permitted at up to 1 watt equivalent isotropic radiated power ("EIRP") with an antenna gain of up to 6 dBi, provided either that any outdoor base station uses an antenna that restricts emissions more than 30 degrees above the horizontal plane, that the device is used indoors, or that the device is used for a point-to-point link. Other outdoor uses would be permitted at up to 250 mW – a 75 percent decrease in power. We noted that by employing an approach based on limiting EIRP more than 30 degrees above the horizontal plane, the NCTA

Marlene H. Dortch

March 18, 2014

Page 2

proposal will permit the immediate use of some existing antennas, albeit at power levels lower than the maximum 1 Watt proposed by NCTA, while incenting antenna manufacturers to develop innovative designs that will allow operations at 1 Watt in the future.

We also pointed out that while the U-NII-1 band has received the most attention of late, it is equally important to the Wi-Fi community that the Commission adopt rules re-opening the 5600-5650 MHz band that is shared with Terminal Doppler Weather Radar ("TDWR"). We noted that Cisco, Wi-Fi Alliance, IEEE 802 and other stakeholders overwhelmingly supported adoption of the rules proposed by the Commission that directly addressed the known causes of interference to TDWR. Cisco also addressed on the ongoing efforts between Wi-Fi interests and the Dedicated Short Range Communications ("DSRC") community to explore ways in which unlicensed uses and DSRC can share the U-NII-4 band without subjecting DSRC to harmful interference. Finally, Cisco reported on the status of efforts to address U-NII-2B spectrum sharing.

Pursuant to Sections 1.1206(b)(2) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.

Respectfully submitted,



Paul J. Sinderbrand

Counsel to the Cisco Systems, Inc.

Attachment



Cisco Visual Networking Index (VNI) Mobile Data Forecast U.S. Highlights 2013-2018

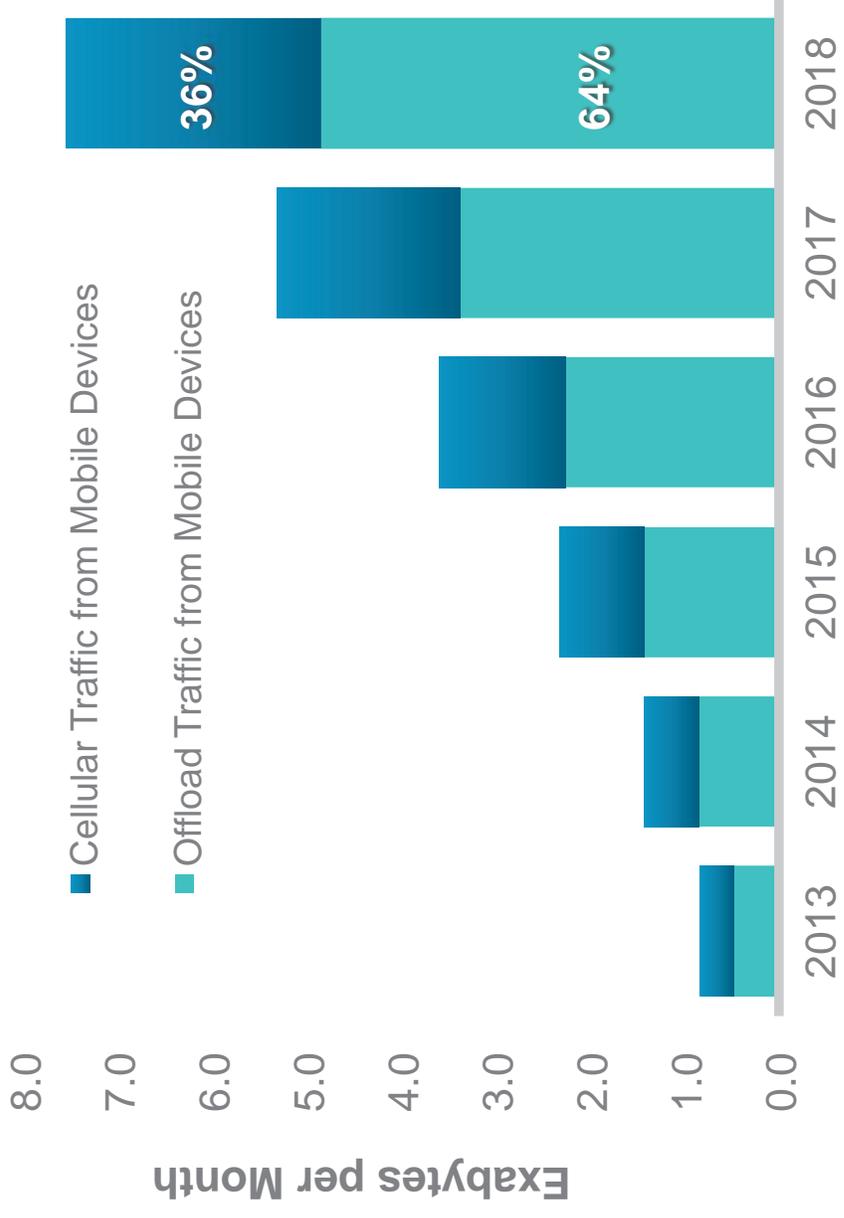
Robert Pepper, VP Global Technology Policy
Doug Webster, VP Service Provider Marketing

February 2014



United States Mobile Data Traffic Offload*

64% of Mobile Traffic to be Offloaded by 2018
57% of Mobile Traffic Offloaded in 2013

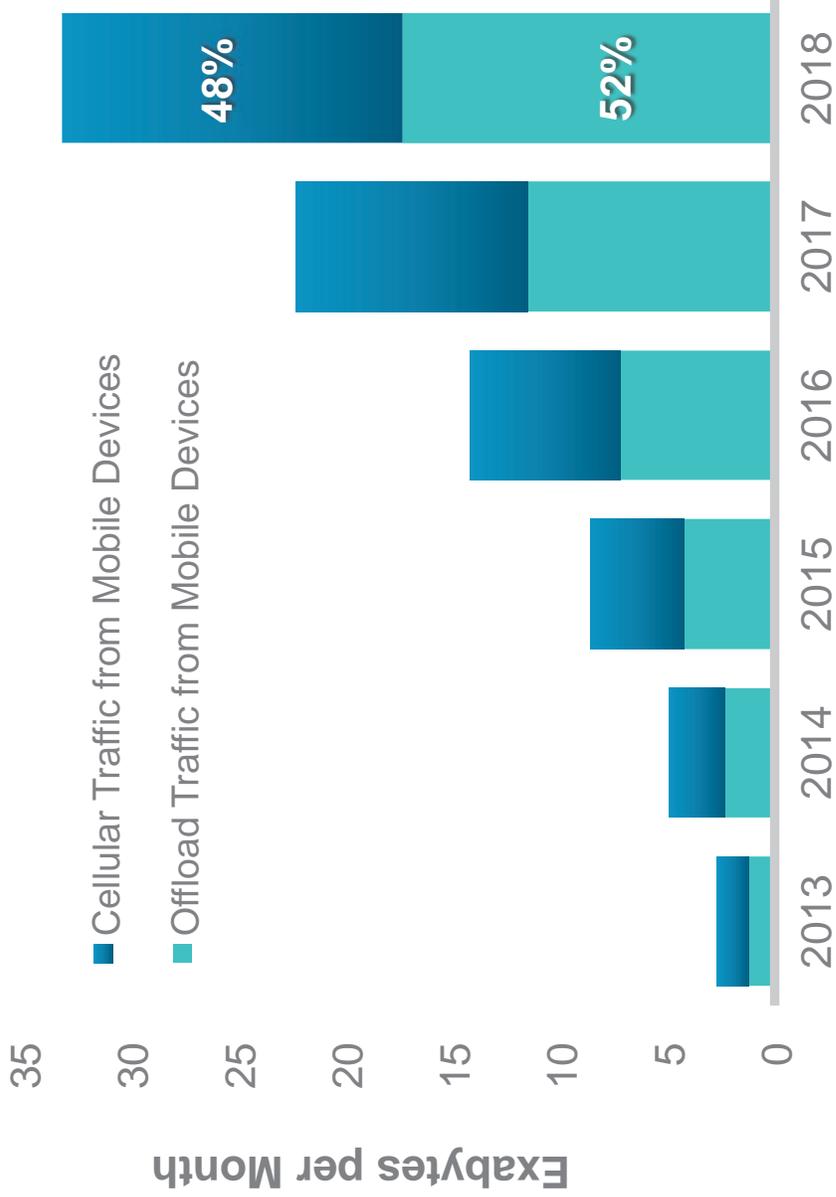


*Offload pertains to traffic from dual mode devices (i.e., supports cell & wi-fi; exc. laptops) over wi-fi/small cell networks

Source: Cisco VNI Global Mobile Data Traffic Forecast, 2013–2018

Global Mobile Data Traffic Offload*

52% of Mobile Traffic to be Offloaded by 2018
45% of Mobile Traffic Offloaded in 2013

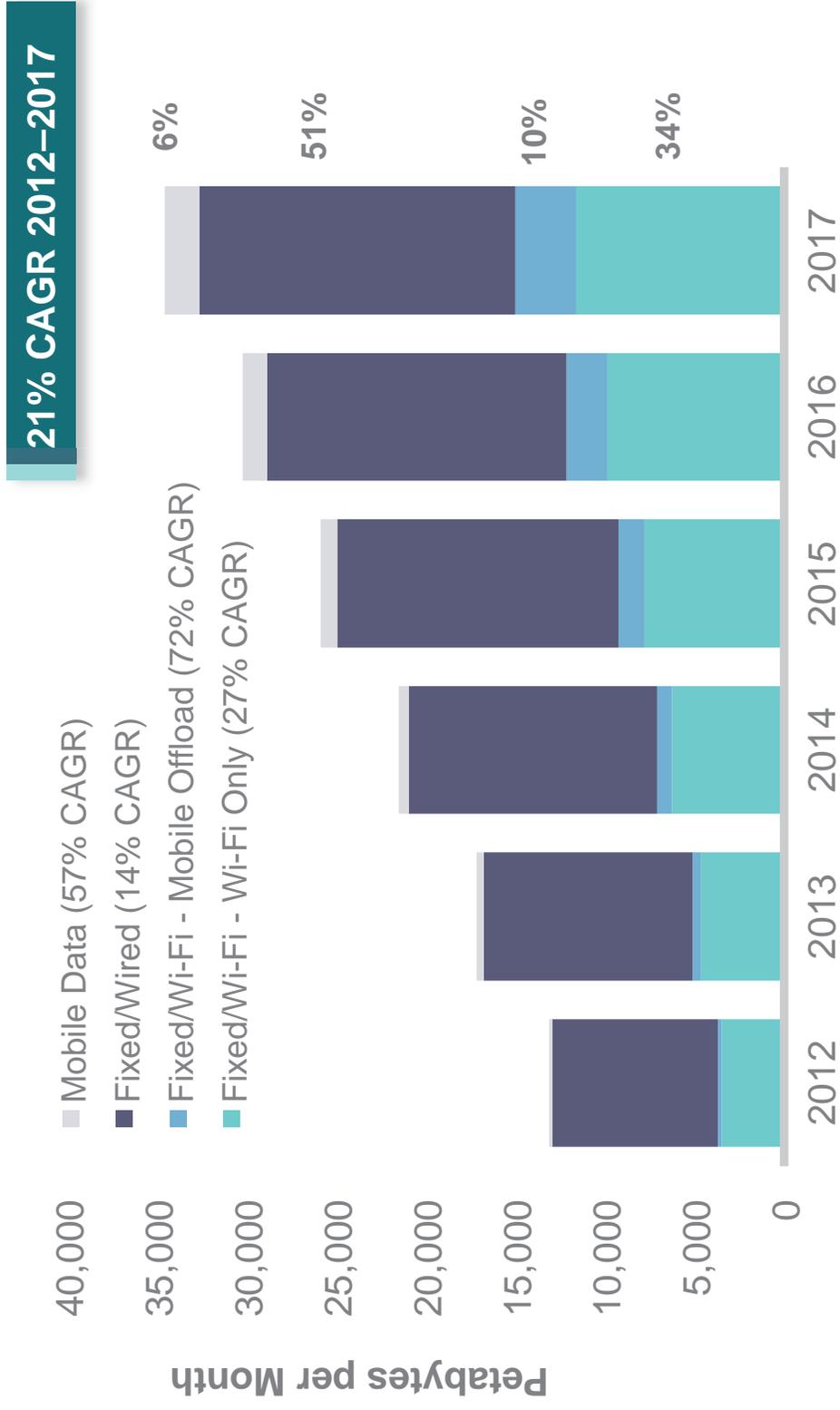


*Offload pertains to traffic from dual mode devices (i.e., supports cell & wi-fi; exc. laptops) over wi-fi/small cell networks

Source: Cisco VNI Global Mobile Data Traffic Forecast, 2013–2018

United States IP Traffic by Local Access Technology

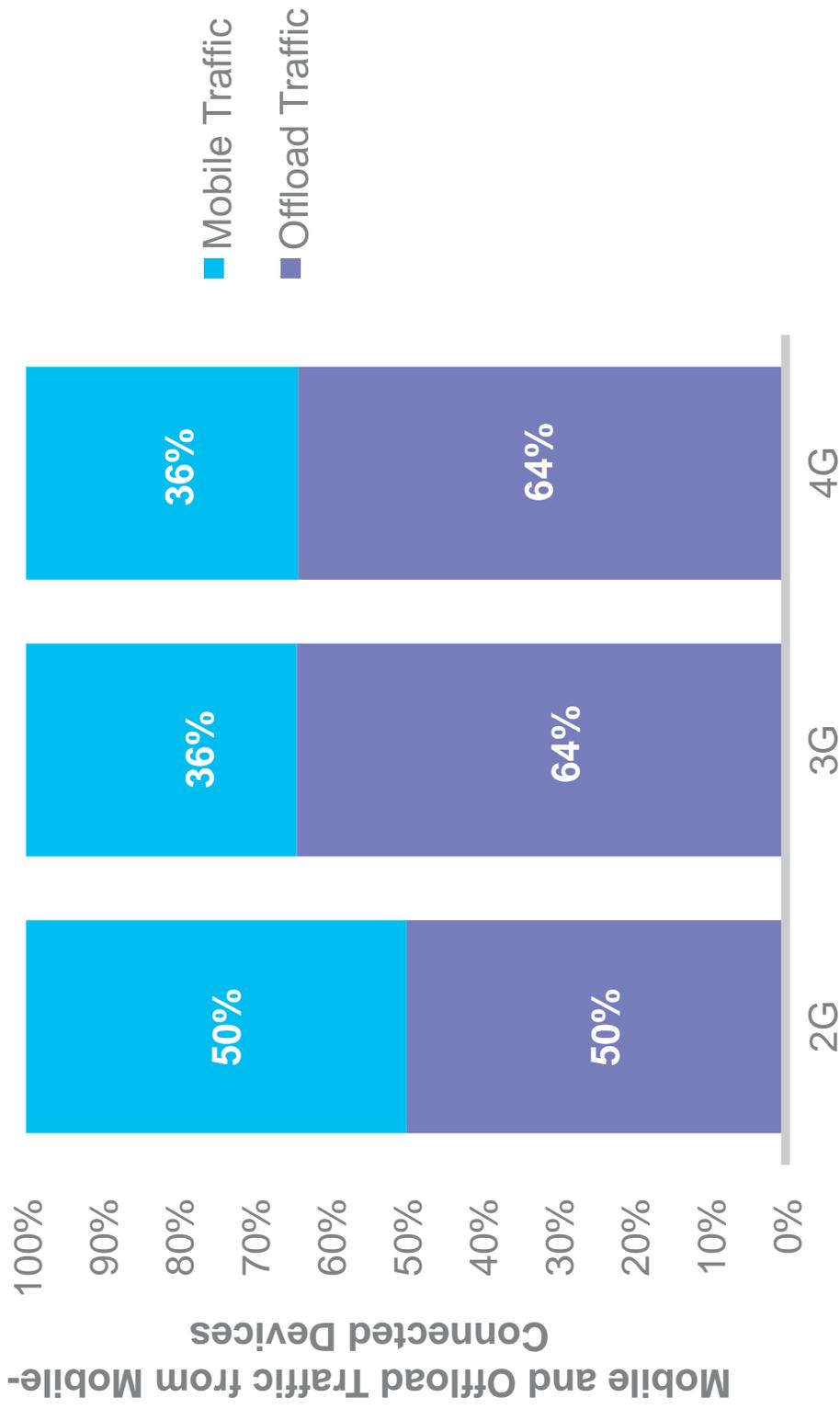
Wi-Fi From Mobile Offload Growing Fastest



Source: Cisco VNI Global Mobile Data Traffic Forecast, 2013–2018

US Mobile Data Traffic and Offload Traffic, 2018

4G Devices Offloads As Much Traffic As 3G and More Than 2G



Source: Cisco VNI Global Mobile Data Traffic Forecast, 2013–2018

© 2013-2014 Cisco and/or its affiliates. All rights reserved.